In the United States Court of Federal Claims

Megan Whittington)
)) 21-1801 C
Plaintiff(s),	Case No.
v.	Judge
THE UNITED STATES,	,)
Defendant. The Shenandooh County Juvenile & Domestic Relations Count, The Shenandooh County Department of Social Services	,))

COMPLAINT

Your complaint must be clearly handwritten or typewritten, and you must sign and declare under penalty of perjury that the facts are correct. If you need additional space, you may use another blank page. A fillable pdf is available at http://uscfc.uscourts.gov/filing-a-complaint.

If you intend to proceed without the prepayment of filing fees (*in forma pauperis* (IFP)), pursuant to 28 U.S.C. § 1915, you must file along with your complaint an application to proceed IFP.

1. **JURISDICTION.** State the grounds for filing this case in the United States Court of Federal Claims. The United States Court of Federal Claims has limited jurisdiction (*see* e.g., 28 U.S.C. §§ 1491-1509).

Violation of Constitutional and Fundamental Liberty and Interests of the care of my child Unconstitutional Infringement on Fundamental Rights in Violation of Rights to Family Integrity and Due Process of Law in a Pattern of Legal Error, Bill of Rights 8, 9, 11 all violated Guaranteeing Fair Procedure and non-arbitrary action violating Substantive and Procedural Due process of law Section 242 of Title 18 makes it a crime for a person acting under color of any law to willfully deprive a person of a right or privilege that is protected by the Constitution. The Conduct of State Officials, Commonwealth Attorney, Brian Layton, Judge Chad Logan, and DSS Stephanie Danner (no longer employed with LDSS) causing Deprivation of Rights, Unreasonable Search and Seizure, Violating Fourth Amendment with malicious intentions causing Deprivation of Constitutional Rights and Federal Constitutional Rights to Not ever receiving Due Process, Infringed Under Color of State Law, Equal Protections Rights.

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Plaintiff, Megan De'an Whittington	, resides at 120 Hottel Road
	(Street Address)
Woodstock, Virginia 22664	, 540-333-1401
(City, State, ZIP Code)	(Telephone Number)
If more than one plaintiff, provide the same	information for each plaintiff below.
	gun other lawsuits in the United States Court of Federal es No
If yes, please list cases:	·

4. STATEMENT OF THE CLAIM. State as briefly as possible the facts of your case. Describe how the United States is involved. You must state exactly what the United States did, or failed to do, that has caused you to initiate this legal action. Be as specific as possible and use additional paper as necessary.

In a Pattern of Legal Error; The Shenandoah County Juvenile and Domestic Relations Court and The Shenandoah County Department of Social Services continue to cause extreme emotional and mental distress. On 9/22/2020 we were treated extremely unfairly. Judge Logan and Commonwealth Attorney Brian Cooper Layton refused to allow all parties to be heard in a matter alleging my son of truancy. Not allowing key testimony that offered proof, providing information that would have given a completely different outcome if heard. The testimony gave the preponderance of the evidence, proving my son's innocence to the allegations of truancy. A petition was filed by truant officer Amanda Kibler, not in compliance with 8VAC20-730-20, and Intake Officer Jennifer Lowry filed the petition alleging truancy without required 8VAC20-730-20, beginning a pattern of legal error. The Commonwealth of Virginia refused to hear the truth and recognize key testimony from High School Principal Lori Swortzel verifying that I was in direct contact with her throughout the school year, keeping her informed, in private. On 12/21/2018, I witnessed my dad's sudden and untimely death after returning home too late to save him from an intentional Fentanyl overdose caused by Blue Ridge Hospice, Dr. Richard Milligan. Witnessing the death of my father created life-altering events. Making all absences completely out of my son's control. Judge Logan showed prejudice to me and my son by not allowing testimony and made an improper ruling, convicting my son of truancy on 9/22/2020. We were treated unfairly, with no respect or dignity, and discrediting me, my son Alic, almost 17 at the time is not and has not ever been a child in need of supervision, not ever having been subjected to abuse or neglect, nor ever committed any crimes. My son did not ever have attendance issues before the year 2018 with 2019-2020 caused by reasons out of his control. There was no evidence to support the appointment of Larry Mayer, CHINS. In a court hearing on 10/27/2020 regarding my son's truancy matter, Larry Mayer violated my constitutional rights. With no established probable cause randomly requested I take a drug screen during my son's truancy proceeding causing unlawful search and seizure diminishing expectations of privacy, violating the due process clause under the Fourth Amendment. Positive drug screen results were read and immediately Judge Logan put the Shenandoah County Department of Social Services on notice and I was attacked in the Ambush trial. Judge Logan seemed to lack judicial competence, allowing Stephanie Danner former LDSS to directly engage in conduct on his behalf and rule in judicial proceedings, allowing the immediate removal of my son based on insufficient evidence, therefore the Right to Substantive Due Process under The Fourteenth Amendment has been violated with no allegations of abuse, neglect or maltreatment ever being made. The Shenandoah County Department of Social Services Improper Interference with Fundamental Constitutional Rights to Family Integrity and Relations, With no reports of neglect or abuse ever created involving my children, CPS had no evidence of abuse providing grounds for the immediate removal of my son. CPS Process and Requirements state that CPS is only to remove a child when abuse has occurred and the child cannot safely remain in his home. Former FSS at LDSS Stephanie Danner never created a disposition or report providing information that would explain any danger that my son would be at risk of if left at home. Government action substantially interfering with fundamental rights to family integrity violating the First Amendment that protects the fundamental right to intimate association including family association between parents and children. Stephanie Danner former FSS at Shenandoah

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4. STATEMENT OF THE CLAIM

County DSS, coercively removed my son by immediately threatening me that my son would be placed in foster care, with no pre-deprivation hearing, despite the fact that there was no evidence of abuse, neglect, or any danger to my son faced at home. Violating Procedural Due Process. I was given no explanation of any charges against me and I continue to face conviction. Judge Logan's harsh treatment has deprived my family of due process, refusing to hold a normal trial and allowed the unlawful seizure of my son, violating the Commerce Clause. For more than ten months I continue to be deprived of Life and Liberty not ever being informed of grounds in which were found to justify the actions of Stephanie Danner Shenandoah County, former FSS with no trial ever offered, my son was 16 at the time and was not even allowed to give testimony. LDSS did not ever make a required home visit to ensure my son's safety and made no efforts to prevent or eliminate the need for removal. Violating my son's right to Family Integrity. We were denied Fundamental Rights and given no due process after the immediate removal of my son. Depriving me of life and liberty causing severe mental pain and suffering from pain reaching an intolerable intensity, feeling of complete emptiness. Shenandoah County Department of Social Services was not in compliance with Federal requirements, never filing a petition for removal and treating the matter as an emergency allowing me only supervised visitations without justification, completely restricting my ability to be alone with my son. The Commonwealth of Virginia never allowed an initial hearing alleging maltreatment, or abuse to determine whether my son should have ever been removed. I was never shown any substantial or credible evidence against me. I have received no information regarding this issue. I was never provided notice of any charges against me. Leaving me completely unsure of what was expected of me. There was no court order requiring anything from me other than to attend meetings set by LDSS. I was not provided with an opportunity to defend myself regarding any matter against me in a meaningful way at a meaningful time. I was told I remain in full custody of my son, Stephanie Danner made recommendations that I only have supervised visitation with my 17-year-old son, as well as admit myself into an inpatient rehab with no drug-related history and not having an addiction to any drugs and no evidence against me, Stephanie Danner recommendations were not evaluated with no recommendations made that followed any logical reasoning. Stephanie Danner's conduct was extreme and outrageous causing irreparable damage, inflicting emotional and mental distress, and what she has done to my family causing detrimental harm and irreparable damage-causing extreme mental and emotional distress. Most recently I was convicted wrongfully and wrongfully arrested. It has been nearly a year, and my son has not been to the dentist and other doctor visits have been placed on hold, showing a complete disregard for my son.

5.	RELIEF.	Briefly	state	exactly	what	you	want	the	court	to	do	for v	you
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I am seeking Immediate relief of	the Fugitive status due	to False allegation	ns that have been persued with no probable cause or evidence to support
a court order. I also ask that m	y son Alic, 17 years old	d is assured he m	ay return home. Please allow this extreme and outrageous process of
legal terror to end I have been	victimized for nearly a	year not allowed	to be with my son with no hearing ever scheduled PLEASE HELP ME
I declare under penalty Signed this 31 (day)	y of perjury that day of August	the foregoin	g is true and correct.
			Signature of Plaintiff(s)